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1001 Wotan Road
Columbia, South Carolina 29229
February 20, 2008

VIA HAND DELIVERY
The Honorable Charles Terreni
Chief Clerk, Administrator
South Carolina Public Service Commission
101 Executive Drive, Suite 100
Post Office Drawer 11649
Columbia, South Carolina 29211

RECEIVED
2008 FEB 21 AM 10:55
SC PUBLIC SERVICE
COMMISSION

Re: Motion to Establish a Second Hearing for the Purposes
of Examining Newly-Presented Evidence by the Utilities
Relative to the Petition of the Office of Regulatory Staff to
Establish Dockets to Consider Implementing of the Require-
ments of Section 1251 (Net Metering) of the Energy Policy
Act 2005, Docket No. 2005-385-E

Dear Mr. Terreni,

Please find enclosed on behalf of myself, an intervener in the original hearing for the above established Docket, ten copies of the Motion to establish an additional hearing to examine new evidence concerning their net metering tariffs prepared and presented by the utilities Progress Energy, Duke Power, and South Carolina Electric and Gas to the PSC.

Please accept this original and eleven copies of this motion for filing. Please file stamp the eleventh copy enclosed and return it to me via certified mail.

By copy of this letter, I am serving all other parties of record with a copy of the enclosed motion and attached certificate of service.

Feel free to contact me regarding any question you may have.

Sincerely,

Pamela Greenlaw

Pamela Greenlaw
Intervener

Enclosures

*C.C. Manette S. Edwards, Esquire
Shannon Bowyer Hudson, Esquire*

*Len A. Anthony, Esquire
Catherine Heigel, Esquire
Catherine Taylor, Esquire*

*John F. Hardaway
Mel Jenkins
Keith Thomas
David Odell*

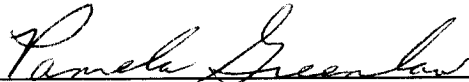
BEFORE THE
PUBLIC SERVICE COMMISSION
MOTION ON DOCKET NUMBER 2005-385-E

Motion to Establish a Second Hearing For the Purposes)
Of Examining Newly-Presented Evidence Relative to the)
Petition of the Office of Regulatory Staff to Establish)
Dockets to Consider Implementing of the Requirements)
of Section 1251 (Net Metering) of the Energy Policy)
Act 2005, Docket No. 2005-385-E)
_____)

**CERTIFICATE
OF
SERVICE**

This is to certify that I have caused to be served this day eleven copies of the
**Motion to Establish a Second Hearing for the Purposes of Examining Newly
Presented Evidence Relative to Net Metering, Docket No. 2005-385-E.**

Nanette S. Edwards, Esquire
Shannon Boyer Hudson, Esquire
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, SC 29201



Columbia, South Carolina
This 21st day of February 2008

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SC PUBLIC SERVICE
COMMISSION

MOTION TO ESTABLISH A SECOND HEARING FOR THE PURPOSES OF
EXAMINING NEWLY-PRESENTED EVIDENCE RELATIVE TO
THE PETITION OF THE OFFICE OF REGULATORY STAFF TO ESTABLISH DOCKETS
TO CONSIDER IMPLEMENTING OF THE REQUIREMENTS OF SECTION 1251 (NET
METERING) OF THE ENERGY POLICY ACT 2005, DOCKET NO. 2005-385-E

Submitted by Pamela Greenlaw, Intervener

1 By this motion I hereby petition the Public Service Commission to hold an additional hearing
2 for the purposes of examining new evidence and cross-examining witnesses testifying about the
3 that new evidence presented to the Public Service Commission
4 concerning the actual net metering program, including tariffs, proposed by Progress Energy, Duke
5 Power, and South Carolina Electric and Gas. The utilities listed above were ordered by the Public
6 Service Commission to develop and present their net metering tariff structures. These qualify as
7 new evidence, which the interveners have the right to examine. Only Duke Energy and South
8 Carolina Electric and Gas sent copies of their net metering tariffs to the interveners. Progress Ener-
9 gy did not, and must do so immediately.

10
11 After such time as Progress Energy completes this task and sufficient time is given for proper
12 examination and study, the additional hearing should be placed on the calendar and the interveners
13 must be invited to come and cross examine witnesses concerning these new tariffs.

14
15 As you may recall, the only witness presenting tariffs in the original hearing was Barbara Yarbor-
16 ough. As she was not presenting the tariffs to be used for net metering, cross-examination of
17 that witness was irrelevant to this case. This means that the interveners have not had an
18 opportunities to cross-examine witnesses whose testimony is indeed relevant to the case.

19
20 The briefing – the proceedings which took place -- did so over the objections of counsel, Nanette
21 Edwards. Her objection has legal foundation, and I urge the Public Service Commission to follow
22 her expert recommendation. Please include the interveners in all proceedings until this docket is
23 complete.

24
25 In light of the above rationale, I urge the Public Service Commission to accept and approve the
26 Motion to Establish a Second Hearing for the purposes of examining newly-presented evidence
27 relative to the petition of the Office of Regulatory Staff to Establish Dockets to consider . . . net
28 metering.

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